

**Exhibit 4 to Objection**

**Summary of Claims Asserted in Lawsuits Underlying Taggart Proof of Claim**

**Foreclosure Action**  
**Case No. 09-25338 (Mont. Cty. Pa.)**

	<b>Cause of Action</b>	<b>Legal Authority, if Specified</b>	<b>Alleged Conduct</b>	<b>Defense</b>
<b>1</b>	Declaratory Judgment Regarding GMACM's Standing and Authority to Foreclose	Not specified.	GMACM lacked authority to declare a default or otherwise pursue collection of debt.	<ul style="list-style-type: none"> <li>Count I is moot. <u>See</u> Section III.B.</li> <li>Count I fails to state a claim upon which relief may be granted. <u>See</u> Section III.B.</li> </ul>
<b>2</b>	Wrongful Foreclosure	Not specified.	GMACM "did not have the right to declare default, cause notices of default to be issued or recorded, or foreclose."	<ul style="list-style-type: none"> <li>Count II is moot. <u>See</u> III.C.</li> <li>Count II fails to state a claim upon which relief may be granted. <u>See</u> Section III.C.</li> </ul>
<b>3</b>	Quiet Title	Not specified.	N/A	<ul style="list-style-type: none"> <li>Count III fails to state a claim upon which relief may be granted. <u>See</u> Sections III.B. &amp; III.D</li> </ul>
<b>4</b>	Slander of Title	Not specified.	GMACM "wrongfully and without privilege, caused a notice of default and Assignment to be recorded against the Property."	<ul style="list-style-type: none"> <li>Count IV fails to state a claim upon which relief may be granted. <u>See</u> Section III.E.</li> </ul>

	Cause of Action	Legal Authority, if Specified	Alleged Conduct	Defense
5	Negligence	Not specified.	GMACM negligently maintained loan records.	<ul style="list-style-type: none"> <li>Gist of the action doctrine prevents repackaging contract claims as tort claims. <u>See</u> Section III.F.</li> <li>Count V is barred by the economic loss doctrine. <u>See</u> Section III.G.</li> <li>Count V fails to state a claim upon which relief may be granted – Claimant has failed to establish a duty or causation. <u>See</u> Section III.H.</li> </ul>
6	Fair Credit Extension Uniformity Act (“FCEUA”)	73 P.S. §§ 2270.4(a) through 73 P.S. § 201-1 et seq. and Fair Debt Collection Practices Act (“FDCPA”)	GMACM “acted intentionally with the purpose of coercing Defendant to pay debts he did not owe.”	<ul style="list-style-type: none"> <li>Count VI fails to state a claim upon which relief may be granted – the FCEUA does not apply to this loan and the FCEUA provides no private cause of action. <u>See</u> Section III.I. and III.J.</li> </ul>
7	Violation of the Pennsylvania Unfair Trade Practices Act and Consumer Protection Law (“UTPCPL”)	73 P.S. §201-1	GMACM engaged in the enumerated list of allegedly deceptive business practices.	<ul style="list-style-type: none"> <li>Gist of the action doctrine prevents repackaging contract claims as tort claims. III.F.</li> <li>Count VII is barred by the economic loss doctrine. <u>See</u> Section III.G.</li> <li>Count VII fails to state a claim upon which relief may be granted – the UTPCPL does not apply to this loan. <u>See</u> Section III.I.</li> </ul>
8	Claimant’s counterclaims do not include a Count VIII.			

	Cause of Action	Legal Authority, if Specified	Alleged Conduct	Defense
9	Invasion of Privacy/False Light	Not specified.	GMACM allegedly invaded Claimant's right to privacy by placing Claimant in a false light when GMACM initiated the Foreclosure Action	<ul style="list-style-type: none"> <li>Count IX fails to state a claim upon which relief may be granted. <u>See</u> Section III.K.</li> </ul>
10	Breach of Contract	Not specified.	GMACM allegedly breached the mortgage contract by (i) failing to comply with mortgage notice provisions (ii) charging excessive fees and interest, (iii) inappropriate application of payments, and (iv) charging for force placed insurance.	<ul style="list-style-type: none"> <li>Count X fails to state a claim upon which relief may be granted – it does not allege damages and is barred by Claimant's material breach of contract. <u>See</u> Section III.M.</li> </ul>
11	Violation of the Mortgage Property Insurance Coverage Act ("MPICA")	7 P.S. §§ 6701 et seq.	GMACM's imposition of forced placed insurance on the Property.	<ul style="list-style-type: none"> <li>Count XI fails to state a claim upon which relief may be granted – the MPICA provides no private cause of action. <u>See</u> Section III.L.</li> </ul>

**First Federal Action**  
**Case No. 12-415 (WD) (E.D. Pa.)**

	<b>Cause of Action</b>	<b>Legal Authority, if Specified</b>	<b>Alleged Conduct</b>	<b>Defense</b>
<b>1</b>	Violation of Due Process	U.S. Constitution, 5th Amendment	Attempted taking of property and FHA License without due process.	<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>
<b>2</b>	Violation of Due Process	PA Constitution		<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>
<b>3</b>	Lack of Fair Trial	U.S. Constitution, 7th Amendment		<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>
<b>4</b>	Lack of Fair Trial	PA Constitution		<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>
<b>5</b>	Restraint of Trade	Not specified.	Restraint of Claimant's ability to make a living.	<ul style="list-style-type: none"> <li>Count V fails to state a claim upon which relief may be granted – FTCA does not provide for private cause of action. <u>See</u> Section IV.A(ii).</li> </ul>
<b>6</b>	Defamation	Not specified.	Defamation by erroneous credit reporting.	<ul style="list-style-type: none"> <li>Gist of the action doctrine prevents repackaging contract claims as tort claims. <u>See</u> Sections IV.A(iii) and III.F.</li> </ul>
<b>7</b>	"Tortuous"	Not specified.	Harm to Claimant's income and reputation due to breach of contract.	<ul style="list-style-type: none"> <li>Gist of the action doctrine prevents repackaging contract claims as tort claims. <u>See</u></li> </ul>

Cause of Action	Legal Authority, if Specified	Alleged Conduct	Defense
<b>8</b> Violations of Unfair Trade Practices Act & Consumer Protection Law	The Unfair Trade Practices Act & Consumer Protection Laws	“The actions of all Defendants” caused loss of income, personal reputation, professional reputation, loss of FHA appraiser license, loss of Pa. State and U.S. Constitutional rights and rights regarding mortgage agreement.	<p>Sections IV.A(iii) and III.F.</p> <ul style="list-style-type: none"> <li>Count VIII is barred by the economic loss doctrine. <u>See</u> Sections and IV.A(iv) and III.G.</li> <li>Count VIII fails to state a claim upon which relief may be granted – the UTPCPL does not apply to this loan. <u>See</u> Sections IV.A(iv) and III.I.</li> </ul>
<b>9</b> “Catch All” Claim	Not specified.	“The actions of all Defendants” caused loss of income, personal reputation, professional reputation, loss of FHA appraiser license, loss of Pa. State and U.S. Constitutional rights and rights regarding mortgage agreement.	<ul style="list-style-type: none"> <li>Count IX fails to meet basic pleading standards <u>See</u> Section IV.A(v).</li> </ul>
<b>10</b> Cause of action ten was not asserted against GMACM.			
<b>11</b> Cause of action eleven was not asserted against GMACM.			
<b>12</b> Declaratory Judgment - Violation of Due Process and Fair Trial	U.S. Constitution (5 <sup>th</sup> and 7 <sup>th</sup> Amendments) and PA Constitution	Claimant seeks a declaration that his FHA appraisal license was taken from him without due process or a fair trial.	<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>
<b>13</b> Declaratory Judgment	Not specified.	Defendants do not have “the Legal Authority to remove an Appraiser’s FHA license for anything other than poor appraisal quality or	<ul style="list-style-type: none"> <li>The Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li> </ul>

Cause of Action	Legal Authority, if Specified	Alleged Conduct	Defense
		performance.”	
14	Cause of action fourteen was not asserted against GMACM.		
15	Cause of action fifteen was not asserted against GMACM.		

**Second Federal Action**  
**Case No. 12-1913 (WD) (E.D. Pa.)**

	<b>Cause of Action</b>	<b>Legal Authority, if Specified</b>	<b>Alleged Conduct</b>	<b>Defense</b>
<b>16</b>	Violation of Due Process and Fair Trial	U.S. Constitution and PA Civil Rights.	Alleged wrongful foreclosure.	<ul style="list-style-type: none"><li>• The complaint fails to meet basic pleading standards. <u>See</u> Section IV.B.</li></ul>



**Bankruptcy Adversary Proceeding  
Case No. 12-01945 (MG) (S.D.N.Y.)**

	Cause of Action	Legal Authority, if Specified	Alleged Conduct	Defense
1	Unclear	Unclear	Defendants “fraudulently placed ‘ <b>Forced Placed Insurance</b> ’ on [Claimant]’s property”	<ul style="list-style-type: none"> <li>To the extent asserted, Claimant has failed to plead a valid RICO claim. <u>See</u> V.A.-V.C.</li> </ul>
2	Unclear	Unclear	Defendants intentionally raised escrow payments and caused a “forced foreclosure.”	<ul style="list-style-type: none"> <li>Count II, like the apparent breach of contract claims contained in other complaints, fails to state a claim upon which relief may be granted – it does not allege damages and is barred by Claimant’s material breach of contract. <u>See</u> Section III.M.</li> </ul>
3	Unclear	Unclear	Defendants “conspired to produce ‘False Affidavits’ in order to foreclose on properties.”	<ul style="list-style-type: none"> <li>Counts III &amp; IV appear to raise the same challenges to standing and the validity of the Verification as raised in other complaints and fails for the same reasons as those other complaints. <u>See</u> III.A(i) - (iv).</li> <li>To the extent asserted, Claimant has failed to plead a valid RICO conspiracy claim. <u>See</u> V.A.-V.C.</li> </ul>
4	Unclear	Unclear	Defendants’ produced and pursued a foreclosure with fraudulent “Mortgage Assignments”	
5	Unclear	Unclear	Defendants’ imposed fraudulent hazard insurance premiums and raised escrow in excess of what was needed or the contract allowed to create a “Force Foreclosure”	

Cause of Action		Legal Authority, if Specified	Alleged Conduct	Defense
6	Unclear	Unclear	Defendants' "conspired to pursue mortgage foreclosure in violation of several government FORECLOSURE Laws, Government Consent Orders, Memorandums, and Settlements."	<ul style="list-style-type: none"> <li>Counts IX appear to raise the same challenges to standing and the validity of the Verification as was raised in other complaints and fails for the same reasons as those other complaints. <u>See</u> III.A(i) - (iv).</li> <li>Count X fails to state a claim upon which relief may be granted, for the same reasons that Claimant's quiet title in the other complaints fail. <u>See</u> Sections III.B. &amp; III.D</li> </ul>
7	Unclear	Unclear	Defendants conspired to transfer Claimant's mortgage without notifying Claimant or recording the alleged transfer.	
8	Mail and Wire Fraud	Unclear	Defendants' committed mail and wire fraud when mailing, electronically filing or e-mailing fraudulent documents	
9	Unclear	Unclear	Defendants' caused confusion regarding the ownership of the mortgage, making their alleged ownership VOID.	
10	Quiet Title	Unclear	All claims for mortgage are based on inaccurate or fraudulent documents and, as a result, Claimant may quiet title.	

Cause of Action		Legal Authority, if Specified	Alleged Conduct	Defense
11	Unclear	Unclear	Defendants' fraudulently made "False Claims" to the U.S. Government on Plaintiff and his property	<ul style="list-style-type: none"><li>Count XI fails to state a claim upon which relief may be granted. <u>See</u> section V.D.</li></ul>
12	"Due Process"	Unclear	Defendants' violated Claimant's and others' due process rights through their alleged use of fraudulent documents.	<ul style="list-style-type: none"><li>Count XII fails for the same reasons that Claimant's other constitutional claims fail - the Debtors are not state actors and did not act under color of law. <u>See</u> Section IV.A(i).</li></ul>